

EXHIBIT N

Moriarty, Matthew

From: Moriarty, Matthew
Sent: Wednesday, July 07, 2010 9:45 AM
To: Dean, Richard
Subject: Actavis: MPM Memo re: Settlement Issues 4/19/10.doc
Attachments: EAS

I left my copy of the last letter on your land phone. Please also look at the attached talking point memo for past meetings with them. Here are some thoughts about the call today:

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9. Our offer is a \$3 million guaranteed minimum in compensation to claimants, recognizing that paid claimants are subject to whatever fee contracts they executed with their lawyers. We will pay a maximum of \$9 million in compensation to claimants. We would pay \$3m into an escrow, plus a reasonable estimate of the administrative costs. Once the paid claims exceeded \$3m, we would pay in \$1m monthly until we reached the final total of \$9m. If the paid claims are less than \$9m, obviously our client keeps that money.
10. Under law we owe no obligation to pay fees and expenses. However, we recognize that ignoring the PSC's time and effort, and compensation for same, could be a stumbling block to settlement. Therefore, PSC may apply to the Court for an award of fees and expenses. After a hearing we would pay what the Court ordered. We will entertain demands to negotiate the amount, but you would have to make disclosures to us of data about time and expenses.

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Attachments:

